

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

RENEE ZINSKY,
Plaintiff,
v.

Civil Action No. 2:22-cv-247-MJH

Judge Horan

MICHAEL RUSSIN, et al.,

Defendant.

JURY TRIAL DEMANDED

AFFIDAVIT OF CHATIQUA HEMINGWAY

I, Chatiqua Hemingway, hereby state the following:

1. I am a professional female boxer.
2. I live and work in the Pittsburgh, Pennsylvania area.
3. Between 2020 and March 2023, I was a member of the Board of Directors for a charity known as Steel City Impact (“SCI”).
4. Between August 2020 and March 2023, I worked for Simon Arias (“Arias”) as a personal trainer.
5. In my capacity as a board member for SCI and trainer for Arias, I worked closely with Arias in Arias Agencies and American Income Life Insurance Company (“AIL”) office located in Wexford, Pennsylvania (“Wexford Office”).
6. Between August 2020 and March 2023, I was in the Wexford Office multiple times per week.
7. Between August 2020 and March 2023, I also spent a lot of time with Arias outside of the office.
8. Between August 2020 and March 2023, I had a close personal and professional relational relationship with Simon Arias.
9. From August 2020 to March 2023, I developed relationships with Arias’ co-workers, Arias’ friends, and Arias’ family members.
10. I witnessed Arias and other male leaders such as Michael Russin (“Russin”) on behalf of AIL in countless work meetings, calls and other events both at the Wexford Office and at other work-related events.
11. I have firsthand knowledge of a misogynistic, sexist, and toxic workplace culture at AIL and Arias Agencies which was driven by the AIL male leaders such as Arias and Russin.

12. For example, AIL leaders such as Arias and Russin often made demeaning, sexist, perverted, offensive, and often angry comments to and about females both in the AIL workplace and otherwise.
13. For example, Arias would refuse to hire or promote females for reasons such “they talk too much” or “ask too many questions”.
14. The toxic workplace culture at Arias Agencies was also driven by Arias’ focus on grooming and recruiting minors on behalf of AIL, Arias Agencies, and SCI.
15. Arias would often lie, mislead, and manipulate minors to his personal and professional benefit.
16. Arias asked me to help him recruit minors. Specifically, Arias said he was looking for “cute young girls”, “good looking popular girls”, and asked me where he could find the “cutest young black girls in Pittsburgh.”
17. I have firsthand knowledge of Arias engaging in inappropriate sexual conversations and conduct with minors as young as 12 and 13 years old.
18. I voiced my concerns about Arias’ inappropriate conduct with minors to other SCI Board members and refused to help Arias recruit minors on behalf of SCI.
19. When Arias learned that I voiced concerns about his inappropriate conduct, Arias offered me \$10,000.00 to step down from the SCI Board of Directors, which I refused.
20. After I refused Arias’ bribe, Arias retaliated against me by removing me from the SCI Board of Directors.
21. After I refused Arias’ bribe, Arias retained legal counsel (Strassburger, McKenna, Gutnik & Gefsky) in an attempt to intimidate, threaten and silence me from speaking the truth.
22. I have firsthand knowledge of AIL’s male leaders, including but not limited to Arias and Russin, engaging in intimidation tactics, threats, and violence in their capacity as AIL representatives.
23. I have firsthand knowledge of AIL’s male leaders, including but not limited to, Arias and Russin taking steroids and other illegal drugs in the office and/or at AIL work related events.

I declare under penalty of perjury that the following is true and correct.

Date: 05/17/2023

Chatiqua Hemmingway
Chatiqua Hemmingway

☐ City ☒ County of _____ Collin

On 05/17/2023, before me, Monica Marie Hall,
Date *Notary Name*

the foregoing instrument was subscribed and sworn (or affirmed) before me by:

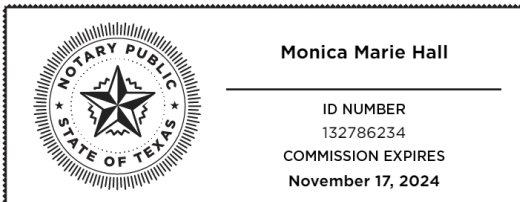
Chatiqua Hemingway

Name of Affiant(s)

☐ Personally known to me -- **OR** --

☐ Proved to me on the basis of the oath of _____ -- OR --
Name of Credible Witness

☒ Proved to me on the basis of satisfactory evidence: driver_license
Type of ID Presented



WITNESS my hand and official seal.

Notary Public Signature: Mona Marie Hall

Notary Name: Monica Marie Hall Notary Public, State of Texas

Notary Commission Number: 132786234

Notary Commission Expires: 11/17/2024

Notarized online using audio-video communication

DESCRIPTION OF ATTACHED DOCUMENT

Title or Type of Document: Affidavit for Chatiqua Hemingway

Document Date: 05/17/2023

Number of Pages (including notarial certificate): 3